

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

Docket No. 2016-330-E

In re:)	
)	
Dick Lee Goold,)	
Complainant/Petitioner,)	AFFIDAVIT OF
)	ROBERT M. STEWART
v.)	
)	
Duke Energy Carolinas, LLC,)	
Defendant/Respondent.)	
_____)	

PERSONALLY appeared before me, Robert M. "Bob" Stewart who first being duly sworn did state as follows:

1. My name is Bob Stewart and I am Manager Distribution Design Engineering of Engineering & Construction Planning-Anderson, Carolinas Delivery Operations, for Duke Energy Carolinas, LLC ("Duke Energy Carolinas" or "DEC"). My office is located in Anderson, South Carolina. I am responsible for zone (customer) engineering for the Anderson, Clemson and Greenwood Offices. I have worked for DEC since June 1981. I received a Bachelor of Science in Electrical Engineering from Clemson University. I have held my current position as Manager Distribution Design since January 1, 2014.

2. My job responsibilities include managing the day to day activities of the zone work force, customer problem resolution, solving design problems and other issues as needed.

3. This affidavit is based upon my personal knowledge and review of documents received and maintained in the ordinary course of business by Duke Energy Carolinas. I am familiar with the records of Duke Energy Carolinas that pertain to the residential account for 1924 McCormick Highway, Greenwood, South Carolina 29646 ("location at issue"). I have

personally worked on said documents and records, and as to the following facts, I know them to be true of my own knowledge or I have gained knowledge of them from the business records of Duke Energy Carolinas, which were made at or about the time of the events, recorded, and which are maintained in the ordinary course of business by Duke Energy Carolinas. If called as a witness, I could and would testify to the same. I submit this affidavit in support of Duke Energy Carolinas' motion for summary judgment.

4. Mr. Goold states in his complaint that "Duke Power" replaced overhead distribution service at the location at issue by installing a #2awg triplex secondary overhead distribution cable to a 200 amp home on a branch circuit. His complaint requests service per NESC.

5. The Public Service Commission regulations that govern acceptable standards for electric systems provide that unless otherwise specified by the Commission, an electrical utility shall use the applicable provisions of the latest edition, Part 2, of the National Electrical Safety Code, ("NESC") as minimum standards of accepted good engineering practice. *See* 10 S.C. Code Regs. § 103-361.

6. The Public Service Commission Regulation 103-363 provides the standards for frequency and voltage.

7. DEC's records reflect that 1924 McCormick Highway in Greenwood, South Carolina has a line load service. The 60 amp meter base for this account is located on DEC's transformer pole. The line runs from the pole overhead to the customer's house. The line to the residence is a #2awg triplex (XLPE) service. Also, there is an additional overhead line with #2awg triplex (XLPE) service to a separate building on this property. The existing overhead transformer is a 25kVA 120/240V single phase. A DEC Engineering Technologist who works

under my supervision visited the site on Monday, September 19, 2016, to confirm the service line information. The lines serving this account are in compliance with NESC Standards and the Commission's regulations. Furthermore, the frequency and voltage is appropriate for the residence and separate building. This account is billed on the Greenwood rate.

FURTHER AFFIANT SAYETH NOT.

Dated this 21ST day of September, 2016.

DUKE ENERGY CAROLINAS

Robert M. Stewart
Robert M. "Bob" Stewart

SWORN TO BEFORE ME

This 21ST day of September, 2016.

Print Notary Name: Pat Morgan
Notary Public for STATE OF SOUTH CAROLINA
My Commission Expires: 1-11-2022